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**Robert T. Blau, Ph.D, CFA**Vice President - Executive and Federal Regulatory Affairs

#### EX PARTE OR LATE FILED

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November 3, 1997

Mr. William F. Caton Acting Secretary Federal Communications Commission Washington, DC 20554

Re: Ex Parte in CC Docket 97-208 and RM-9101

Dear Mr. Caton:

This is to inform you that on October 31, 1997, Gary Epstein, and Karen Brinkmann, both of Latham & Waktins, along with Whit Jordan, Bill Stacy, and the undersigned, all of BellSouth, met with Jordan Goldstein, Robb Tanner, Brent Olson, David Kirschner, Michael Pryor, Jake Jennings, Radhika Karmarkar, Florence Setzer, and Daniel Shiman, all of the Commission, for two meetings. These ex parte meetings were in the above referenced proceedings.

The purpose of the first meeting was to respond to questions from Commission staff regarding BellSouth's OSS specifically to clarify certain technical and implementation issues set forth in its filing.

The purpose of the second meeting was to discuss how BellSouth has adopted and committed to performance measures. The attached presentation was distributed and discussed during this meeting.

Pursuant to Section 1.1206(a)(2) of the Commission's rules, two copies of this notice are being filed with the FCC. Due to the lateness of the meetings, these ex partes are being filed today. Please associate this notification with the above-referenced proceedings.

Sincerely,

Robert T. Blau

Attachment

cc: Jordan Goldstein

D 11 T

Robb Tanner Daniel Shiman Jake Jennings

Brent Olson

Radhika Karmarkar David Kirschner Florence Setzer Michael Pryor

# BELLSOUTH TELECOMMUNICATIONS, INC.

# SERVICE QUALITY MEASUREMENTS (SQM)

**Ex Parte** 

#### PURPOSE OF THIS EX PARTE:

This Ex Parte addresses how BellSouth has adopted and committed to performance measures which:

- (1) compare BellSouth's performance in providing and maintaining services to it's resale customers, Competitive Local Exchange Carriers (CLECs), with similar services BellSouth provides to it's retail customers;
- (2) measure BellSouth's performance in providing and maintaining unbundled network elements to it's wholesale customers:
- (3) compare BellSouth's performance in providing and maintaining local interconnection services to CLECs' customers with services provided to retail customers;

and to measure performance as a necessary prerequisite to demonstrating compliance with the following provisions of Section 251 (47 U.S.C. Section 251):

#### RESALE:

"Offer for resale at wholesale rates any telecommunications service that "BellSouth provides" at retail to subscribers who are not telecommunications carriers" and will "not impose unreasonable or discriminatory conditions or limitations on, the resale of such telecommunications services".

#### UNBUNDLED ACCESS:

"Provide to any requesting telecommunications carrier for the provision of a telecommunications service nondiscriminatory access to network elements on an unbundled basis at any technically feasible point based" on rates, terms, and conditions that are just, reasonable, and nondiscriminatory".

#### (LOCAL) INTERCONNECTION:

Provide "interconnection" "for the facilities and equipment of any requesting telecommunications carrier", with BellSouth's local exchange network "that is at least

October 31, 1997 Page 2 of 8

equal in quality to that provided by "BellSouth" to itself or to any subsidiary, affiliate, or any other party to which" BellSouth provides interconnection" based on rates, terms, and conditions that are just, reasonable, and nondiscriminatory".

BellSouth believes that its existing performance measurements are more than adequate to allow the Commission to verify that it is providing CLECs with facilities and services in accordance with each of these requirements and will continue to do so. This document addresses BellSouth's proactive efforts to develop wholesale measurements and retail comparative measurements, and BellSouth's contractual commitment to performance measures through individual CLEC agreements.

This document will present, in matrix form (figure 1), BellSouth's response to the Service Quality Measurements (SQMs) presented by the Local Competition Users Group (LCUG) in it's September 29, 1997 Ex Parte.

#### BELLSOUTH'S FORMAL DATA COLLECTION AND MEASUREMENT PROCESS

To enable effective ongoing production of measurements which monitor parity and provide meaningful data on a readily available basis, BellSouth has implemented a Data Warehouse. BellSouth's existing Operating Support Systems (OSSs) are run on mainframe computers and have multiple processors. An example of this is the Work Force Administration ("WFA") system. WFA, which is used for provisioning and maintenance of designed services, has seven computer processors. The query systems on the mainframe computers cannot be easily manipulated to produce the measurements required to monitor parity between retail and wholesale customers. The Data Warehouse was developed to meet this need.

Information in the Data Warehouse is loaded from multiple mainframes and combined into regional databases. Orders processed by BellSouth for both its retail units and its CLEC customers are captured for analysis. Standard Query Language ("SQL") queries are written against the databases to produce the measurements. These SQL queries provide the ability to re-create measurements that are currently in place on the mainframe systems, and the SQL queries can separate the retail and wholesale services results for reporting purposes (see figure 1).

October 31, 1997 Page 3 of 8

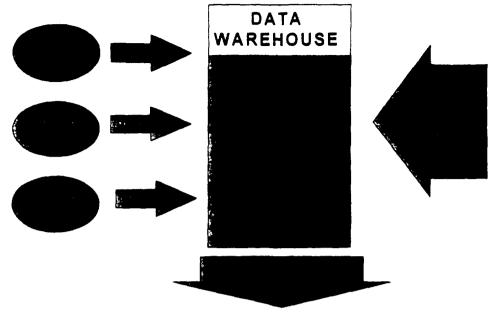


Figure 1

BellSouth plans to provide CLECs with access to the Data Warehouse where CLEC specific results can be obtained, although security and data partitioning requirements are not yet complete.

BellSouth has utilized the data in the Data Warehouse to produce reports in two different formats as negotiations with CLECs have progressed. These formats are:

- (1) Contractual Measurements Those measurements contractually agreed to thus far with AT&T (5/9/97), Time Warner (9/24/97) and US South (9/18/97).
- (2) Permanent Measurements A set of generally available measures based on the contractual measurement set, with some additions, and offered to further demonstrate BellSouth's commitment to performance measures.

BellSouth took an aggressive approach to creating a baseline set of measurements to enable the monitoring of levels of service provided to CLECs, while the development of a full scope of measurements proceeded. Initial measurements became available in March 1997 using February 1997 performance data. By collecting and monitoring these measurements, BellSouth had the ability to identify, analyze, and address any perceived issues. BellSouth has also produced and utilized the reports in various public service commission activities and hearings.

October 31, 1997 Page 4 of 8

#### LOCAL COMPETITION USERS GROUP (LCUG)

On September 26, 1997, the LCUG published a Service Quality Measurements Detail Document, Version 6.0; associated with a Petition for Expedited Rulemaking (RM9101). This document outlines LCUG's proposed Service Quality Measurements. Figure 2 identifies BellSouth's position on each of the measurements in the LCUG document, addressed at a high level, with a reference to the appropriate BellSouth Exhibit supporting that measurement.

Figure 3 is an expanded matrix identifying all of the measurement reports proposed at this time by LCUG and represents approximately 1,044 monthly reports. It is BellSouth's position that to provide this level of granularity on a monthly basis is both unreasonable and counterproductive to both BellSouth and the CLECs and is not in keeping with the true intent of Section 251, of the Act.

# COMPARISON OF BELLSOUTH'S PERMANENT MEASUREMENTS WITH BELLSOUTH'S RETAIL UNIT MEASUREMENTS:

Figure 4 is a matrix which compares BellSouth's permanent measurements with those measurements we are providing for our retail business units. These retail business unit measurements have been developed by BellSouth through long years of successfully meeting the expectations of our retail customers by providing excellent quality and service. This is substantiated by the selection of BellSouth for the J.D. Powers award for "Outstanding Customer Service".

BellSouth believes the overall objective of performance measurements is to insure that a CLEC's customers receive the same quality service that BellSouth offers it's retail end users.

BellSouth's existing measures (Figure 4) are obviously adequate to insure this high level of customer service. Shouldn't a similar set of measures be adequate for the CLEC's customers? To expand these measurements to include the 1,044 measurement reports as proposed by LCUG is ridiculous in both scope and necessity and would complicate the measurement process beyond "meaningful" information.

October 31, 1997 Page 5 of 8

#### SUMMARY:

BellSouth established early in 1997 that it would not only provide services to its CLEC customers in a nondiscriminatory fashion, but that it would also collect data to demonstrate this fact. BellSouth believes that it's existing performance measurements are more than adequate to allow the Commission to verify that BellSouth is providing CLECs with facilities and services in accordance with all aforementioned requirements and will continue to do so.

In the book "Bridge to Quality", published in 1993 by the Compass Consulting Group, Inc., are the following statements:

"There are those who will use data analysis to manipulate the original data so that it supports their emotive position. Data should be analyzed to learn from the system, not to "prove" something or to support a position".

"Whenever data is collected from a system, we must find means to make it useful. We must <u>summarize</u> the data in a way that can be easily understood and yet retains the important information from the original data set".

BellSouth believes that it has summarized the measurement data into reports that are both easily understood and retain the important content of the data. To explode these measurements beyond this scope would destroy the meaningful content of the measurements.

October 31, 1997 Page 6 of 8

Figure 2
LCUG Measurement Matrix with Comments

CATEGORY	FUNCTION	BELLSOUTH COMMENTS	EXHIBIT REFERENCE *	
	Pre-Ordering (PO)		<del></del>	
PO - l	Average Response time for Pre-Ordering information	Yes, currently measured	Exhibit WNS-37(2)	
	Ordering and Provisioning (OP)			
OP - 1	Average Completion Interval	Yes, currently measured, not broken down by	Exhibit	
		major service family	WNS-10 111	
OP - 2	Percent Orders Completed on Time	Yes, provisioning Appointments Met, not broken down by major service family	Exhibit WNS-9, WNS-2'	
OP - 3	Percent Order Accuracy	Yes, currently measured on mechanized orders, not broken down by major service family	Exhibit WNS-41 (2)	
OP - 4	Mean Reject Interval	Yes, Reject/Error Notice Measurement currently produced by CLEC, not a parity measurement, not broken down by major service family		
OP - 5	Mean FOC Interval	Yes, measurement currently produced by CLEC, not a parity measurement, not broken down by major service family		
OP - 6	Mean Jeopardy Interval	Not measured at this time, not applicable to Resale		
OP - 7	Mean Completion Interval	Yes, currently measured, not broken down by major service family	Exhibit WNS-10 (1)	
OP - 8	Percent Jeopardies Returned	Not measured at this time, not applicable to Resale		
OP - 9	Mean Held Order Interval			
OP - 10	Percent Orders Held >= 90 Days			
OP - 11	Percent Orders Held >= 15 Days			
	Maintenance and Repair (MR)			
MR - 1	Mean time to Restore	Yes, maintenance avg. duration, receipt to clear	Exhibit	
		hours, not broken down to all LCUG Standard	WNS-9 (I)	
<u> </u>		Service Levels and Disposition and Causes	WNS-2 (1)	
MR - 2	Repeat Trouble Rate	Yes, maintenance Repeat Troubles, 30 day, not broken down to all LCUG Standard Service Levels and Disposition and Causes	Exhibit WNS-9 (1)	
MR - 3	Trouble Rate	Yes, % Trouble Report Rate, not broken down to	Exhibit	
J	Trouble Rate	all LCUG Standard Service Levels and Disposition and Causes	WNS-9 (1)	
MR - 4	Percentage of Customer Troubles Resolved Within Estimate	Not currently measured. Not applicable to Specials		
	General (GE)			
GE - I	Percent System Availability	Yes, system availability measurements are	Exhibit	
		generally in place for mainframe legacy systems accessed by the local competition interfaces.	WNS-36 (2)	
GE - 2	Mean Time to Answer Calls	Yes, currently measured on Legacy system access (RNS, LENS)	Exhibit WNS-37 (2)	
GE - 3	Call Abandonment Rate			
	Billing (BI)			
BI - 1	Mean Time to Provide Recorded Usage Records	In a Resale or UNE environment, the AMA recording has no identifiers to distinguish CLEC usage from BellSouth usage. However, BellSouth can provide usage data.	Exhibit WNS-40 (2)	
BI - 2	Mean Time to Deliver Invoices			
BI - 3	Percent Invoice Accuracy			
BI - 4	Percent Usage Accuracy			
	Operator Services and Directory Assistance (OS, DA)			
	Mean Time to Answer	Currently measured for the State Commissions		
OS/DA - 1				

October 31, 1997 Page 7 of 8

	Network Performance (NP)		
NP - I	Network Performance Parity	Currently measured by a combination of end user trouble reports and network reports	Exhibit WNS-9 (1) WNS-11 (1) WNS-12 (1) WNS-13 (1) WNS-14 (1)
	Interconnect/Unbundled Elements and Combos (IUE)		
IUE - I	Function Availability		
IUE - 2	Timeliness of Element Performance		

- \* References are to: W.N. Stacy's exhibits filed as part of FCC Docket 97-208 and are referred to as:
  (1) Affidavit of William N. Stacy dealing with Performance Measures
  (2) Affidavit of William N. Stacy dealing with Operating Support Systems

Page 8 of 8 October 31, 1997

#### LOCAL COMPETITION USERS GROUP

#### PROPOSED SERVICE QUALITY MEASUREMENTS REPORTS (1044)

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#### LOCAL COMPETITION USERS GROUP

#### PROPOSED SERVICE QUALITY MEASUREMENTS REPORTS (1044)

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No Trouble Found		×	×	×	×	×	X	X	×	×	×	X	X	×	X X
Central Office Equipment	[ [	×	x	×	×	×	×	×	×	×	×	×	X	X	x x
Interoffice Facilities		×	x	x	×	×	×	X	×	X	x	×	×	x	X X
Loop/Access Line		×	x	x	_ x	x_	_ X	X	×	x	×	×	X	×	X X

#### LOCAL COMPETITION USERS GROUP

#### PROPOSED SERVICE QUALITY MEASUREMENTS REPORTS (1044)

All Other Troubles		×		×	X	×	×	×	X	×	X	×	X	×	X	×	×
No Access		×	- 1	x	×	×	x	×	×	×	×	×	×	×	×	×	×
ESTIMATED TIME TO RESTORE MET	7				!		l			1		1	Ì	ĺ		Ī	į į
Out of Service - No Dispatch	1 1	×		×	×	×	×	×	×	x	×	x	X	×	×	×	×
Out of Service - Dispatch	1 1	x		x	×	×	×	x	×	×	×	×	×	×	×	X	×
Hold Open for Monitoring	1 1	×		x	×	X	×	X	x	×	×	×	×	×	×	x	×
CPE Trouble - Incl. Inside wire	1 1	x	i	×	×	×	×	×	×	×	×	×	×	×	×	×	×
No Trouble Found	11	×	i	×	×	×	×	×	×	×	×	X	×	×	×	×	×
Central Office Equipment	1 1	x	i	×	×	X	×	×	×	x	×	×	×	×	×	×	×
Interoffice Facilities	1 1	×	ł	×	×	×	×	X	×	X	×	×	×	×	×	×	×
Loop/Access Line	1 1	×	İ	×	×	x	×	X	×	×	×	×	×	×	×	X	×
All Other Troubles	1 1	×	- 1	×	×	×	×	X	×	×	×	×	×	×	×	×	×
No Access	1 1	×		×	×	×	1 x	*	¥	¥	×	* **	* ×	* * ·	×	<u>x</u>	×

GENERAL	
PERCENT SYSTEM AVAILABILITY	
Interface Type	x
Business Period	×
MEAN TIME TO ANSWER CALLS	
By Support Center Provided	×
CALL ABANDONMENT RATE	
By Support Center Provided	x

	End User Direct Bill	End User Atternate Bill	Access	TSR	UNE
BILLING					L
TIMELINESS OF RECORD DELIVERY					
Mean Time to Provide Record Usage	×	×	×	Ī	
Mean Time to Deliver Invoices	x	x	×		
ACCURACY OF BILLING RECORDS					
Percent Usage Accuracy		1		x	×
Percent Invoice Accuracy	1	1 1		×	×

#### OPERATOR SERVICES AND DIRECTORY ASSISTANCE

MEAN TIME TO ANSWER	
OS - Machine Answer Time	x
OS - Human Answer Time	×
DA - Machine Answer Time	ĺ x
DA - Human Answer Time	x

								·			
	Subscriber	Signal to	idle	Loop -	Circuit	Attenus-	Dial	Post	Call - Comp	Ntwk Incid.	Ntwk Incid.
	Loop	Noise	Channel	Circuit	Notched	tion	Tone	Diel	Delivery	>5000	>100,00
	Loss	Ratio	Ckt.Noise	Balance	Noise	Distortion	Delay	Delay	Rate	Block Calls	Block Calls
NETWORK PERFORMANCE											
NETWORK PERFORMANCE PARITY											
Transmission Quality	x	×	×	×	×	×					
Speed of Connection			i				X	x	×	[	
Reliability									•	x	X

#### AVAILABILITY OF NETWORK ELEMENTS

AVAILABILITY OF NTWK. ELEMENTS		
By Unique UNE or UNE Combo		X
employed	ļ	

## Performance Measurements Comparison Matrix CLEC vs BST Business Units

	CLECS		BELLSO	UTH TELECON	MUNICATIONS, INC.
	RESALE	FACILITY	SMALL	CONSUMER	BELLSOUTH
		BASED	BUSINESS	L	BUSINESS SYSTEM
PROVISIONING	-				
Order Reject/Error Notice	X	Χ.			
FOC	X	X			
% Provisioning Appointments Met -	1	X	POTS	POTS	POTS
Residence Dispetch Out	×				
Residence Non-Dispatch	X				
Business Dispatch Out	X				
Business Non-Dispatch	X				
Specials	X	X	J		×
% Report Rate  Residence Dispatch Out	×		X	X	X
Residence Non-Dispatch	x				
Business Dispatch Out	x				
Business Non-Dispatch	x	-			
Specials	-	***			X
% Appointment Windows Met	1			X	
Total Number Existing Unbundled Loops		X		. "	-
Unbundled Loop Orders	}-	X			**
MAINTENANCE	+				
Total Troubles	+	·		•	-
% Maintenance Appointments Met -			POTS	POTS	
Residence Dispatch Out	X				-
Residence Non-Dispatch	<u>x</u>				
Business Dispatch Out					X
Business Non-Dispatch	<del>x</del>				· x
In by 3, cleared same day				· · ·	
In by 3 by Network, cleared same day			Y	· <del>-</del>	
Haintenance Average Duration (Rect. to Cir)	···	X	- 7		
Residence Dispatch Out	X	^			•
Residence Non-Dispatch	x	-			-
Business Dispatch Out	x -				•
Business Non-Dispatch	X				
Rect. to Pending Cleared (< 30 min., 30-45 min.,			X	x	X
45-60 min., > 60 min.	)				
Pending Dispatch to Clear		,	X	X	×
Special Services Average Duration	X				X
% Maintenance Repeat Troubles, 30 days		X	POTS	POTS	POTS
Residence Dispatch Out	X				
Residence Non-Dispatch	X				
Business Dispatch Out	x				
Business Non-Dispatch	x				
Specials	X				X
4 Trouble Report Rate		X	POTS	POTS	POTS
Residence Dispatch Out	X				
Residence Non-Dispatch	X				
Business Dispatch Out	X				
Business Non-Dispatch	X				
Specials	x				
failure Rate - Specials	L				X
% Provisioning Troubles w/l 30 days of install.		X			POTS
Residence Dispatch Out	X				
Residence Non-Dispatch	x				
Business Dispatch Out	X				-
Business Non-Olspatch	x				
Specials	X				X
6 Out of Service < 24 Hours	L				
Residence Dispatch Out	<u> </u>				
Residence Non-Dispatch	<u>x</u>				
Business Dispatch Out	X				
Business Non-Dispatch	<u> </u>				
Specials	<u> </u>				
Average Answer Time (RRC)	X	_X			
LOCAL INTERCONNECTION TRUNKING					
LOCAL INTERCONNECTION TRUNKING  6 Provisioning Appointments Met	Х				
<del></del>	X				
4 Provisioning Appointments Met					